



# SOUTHWEST COLORADO COUNCIL OF GOVERNMENTS

7 December 2017

Federal Communications Commission  
Chairman Ajit Pai  
445 12th Street SW  
Washington DC 20554

RE: FCC 17-108 – Reversing 2015 Net Neutrality Order

Dear Chairman Pai,

The Southwest Colorado Council of Governments (SWCCOG) is located in the southwest corner of the State of Colorado. The mission of the SWCCOG is to provide regional leadership on behalf of governments throughout Southwest Colorado by defining regional issues, advocating for mutual goals, and administering regional programs. The region includes the counties of Archuleta, Dolores, La Plata, Montezuma, and San Juan, the municipalities of Bayfield, Dolores, Durango, Ignacio, Mancos, Pagosa Springs, Rico, and Silverton, as well as the two Native American Tribes of the Southern Ute and the Ute Mountain Ute. Adequate internet connectivity is vital to the advancement of Southwest Colorado - and all of rural America - critical for business, education, and economic development. We are deeply concerned about proposed regulatory changes related to the provision of internet service.

The digital divide remains extreme between rural and urban areas. Unfortunately, hard-to-reach locations such as southwest Colorado do not provide sufficient return on investment for strictly market-driven forces to expand infrastructure such to allow rural regions to be connected at a level commensurate with the rest of the country. We see no evidence that reinstating a "light-touch" regulatory framework would serve our communities any better than it has in the past.

Like high-speed internet, originally electricity and telephone service were not cost-effective to bring to outlying areas. Without efforts to ensure widespread infrastructure to support these technologies, rural America would have been decimated. Access to the internet is as critical in the 21<sup>st</sup> century as electricity and telephone lines were in the last century.

In underserved regions if internet access is available it is often at very slow speeds and frequently there is only one provider option. In this situation, if a provider chooses to use business practices that would create competitive pressure in more populous regions, such as blocking, throttling and paid prioritization, customers are left without alternative options. To ensure reasonable access to the internet in areas where it is already extremely limited, we encourage you to maintain the critical "bright line" customer protections. These protections provide assurances to customers that internet access will remain reasonably unfettered while not creating excessive limitations on businesses.

The changes in usage and prominence of the internet in the past 20 years have been so extreme as to leave the internet virtually unrecognizable compared to the 1990s. Using the same regulatory framework

for a vastly different type of service is shortsighted, current and future regulation must be adaptable as the technology continues to evolve. Considering the telecommunications industry significantly impacts people's lives and businesses on a daily basis, it is sensible to have a regulatory structure in place to ensure that Americans will retain the freedom to access lawful content, use applications, attach personal devices to the network, and obtain service plan information without arbitrary restrictions.

We urge you to maintain net-neutrality regulations for the provision of internet service. Rural America faces ongoing internet connectivity challenges, alleviating these will require higher level requirements than simple profitability for providers. Thank you for your consideration on this matter.

Sincerely,



Miriam C. Gillow-Wiles  
Executive Director  
Southwest Colorado Council of Governments  
[director@swccog.org](mailto:director@swccog.org)

cc:

U.S. Senator Michael Bennet  
U.S. Senator Cory Gardner  
U.S. Representative Scott Tipton  
Colorado State Senator Don Coram  
Colorado House District 58 Representative Marc Catlin  
Colorado House District 59 Representative Barbara McLaughlin